

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE**

SNMP RESEARCH, INC. and SNMP RESEARCH INTERNATIONAL, INC.,

§ Case No. 3:20-cv-00451

Plaintiffs,

V.

**BROADCOM INC.; BROCADE
COMMUNICATIONS SYSTEMS LLC;
AND EXTREME NETWORKS, INC.**

Jury Demand

Defendants.

**PLAINTIFF SNMP RESEARCH, INC.'S MOTION TO COMPEL DISCOVERY
RESPONSES FROM DEFENDANT EXTREME NETWORKS, INC.**

COMES NOW Plaintiff SNMP Research, Inc. (“SNMP Research” or “Plaintiff”) and, in accordance with Rules 26, 33, 34, 36, and 37 of the Federal Rules of Civil Procedure, this Court’s inherent authority to control the conduct of discovery, the Local Rules of this Court and Plaintiff’s Memorandum of Law submitted contemporaneously herewith, moves this Court to Compel Discovery Responses from Defendant Extreme Networks, Inc. (“Extreme” or “Defendant”).

1. On December 26, 2020, Plaintiff served written discovery on Defendant.
 2. Despite repeated efforts by Plaintiff to meet and confer with Defendant Extreme in order to resolve Extreme’s objections to Plaintiff’s discovery and to secure production of documents and information from Extreme, numerous areas of dispute remain for which Plaintiff submits this Court’s assistance is required at this juncture.

3. Defendant’s conduct flouts its obligations under the Federal Rules of Civil Procedure. Plaintiff is prejudiced in the prosecution of its claims by Defendant Extreme’s conduct and refusals.

4. In support of this Motion, Plaintiff submits the accompanying Plaintiff’s Memorandum of Law and Declaration of Olivia Weber.

WHEREFORE, for the reasons set forth above, and as are set forth in Plaintiff's Memorandum of Law in support of its Motion to Compel Discovery Responses from Defendant Extreme Networks, Inc., and upon the grounds as shall be raised at oral argument of this Motion (if any), Plaintiff asks this Court to enter an order striking certain objections, compelling Defendant to respond to outstanding discovery propounded by Plaintiff and to produce documents as further delineated in Plaintiff's Memorandum of Law submitted contemporaneously with this Motion within two weeks of this Court's order or by a date certain. Plaintiff also asks this Court to grant it any additional and further relief to which the Court determines Plaintiff is entitled under applicable authority.

Respectfully submitted,

Dated: October 4, 2021

By: /s/ Cheryl G. Rice

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